

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KELLY TOYS HOLDINGS, LLC,

Plaintiff,

V.

ALIALIALILL STORE, *et al.*,

Defendants

)
)
)
)
)
) No. 21-cv-8434 (JMF)
)
) **MOTION FOR ADMISSION**
) **PRO HAC VICE**
)
)
)

Pursuant to Local Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, Martin C. Calhoun, hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Defendant Alibaba.com Singapore E-Commerce Pte. Ltd.

I am in good standing of the bars of the District of Columbia and the State of Maryland, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: April 16, 2025

Respectfully submitted,

/s/ Martin C. Calhoun
Martin C. Calhoun

Balance Law Firm
One World Trade Center, Suite 8500
New York, NY 10007
(212) 741-8080
martin.calhoun@balancelawfirm.com

*Attorneys for Defendant Alibaba.com
Singapore E-Commerce Pte. Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, I caused the foregoing Motion for Admission Pro Hac Vice to be served via ECF on all counsel of record.

/s/ Martin C. Calhoun

Martin C. Calhoun